

**From:** [Jerrad Setser](#)  
**To:** [E-OHPSCA-ER.EBSA](#)  
**Subject:** Clarification on 90 day waiting period-comment  
**Date:** Friday, September 07, 2012 9:23:46 AM

---

If an employer has a waiting period with 1st of the month following 90 days, will they satisfy the requirement?

Example. Employee is hired on January 5th and would be eligible May 1.

Employers have set payroll deduction amounts determined by a full month of premium. If the need for prorated rates occur, this will lead to additional admin work on the employer and possibly lead to postponing hire dates until the first of the month or will force employers to put person on part time basis in order to get around penalties.

Sent from my iPhone

Todd Setser,CIC  
Brown & Brown of Arkansas